

301 Commerce Street, Suite 500
Fort Worth, TX 76102

September 28, 2021

Director, Air Enforcement Division
U.S. Environmental Protection Agency
MC 2242A
1200 Pennsylvania Ave. NW
Washington, D.C. 20460

Director of Litigation
Litigation Division, MC-175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Director
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1201 Elm Street
Dallas, TX 75270

Division Chief
Environmental Protection Division
Office of the Attorney General of Texas
P.O. Box 12548, MC 066
Austin, TX 78711-2548

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611

**Re: Malfunction Event Notice
Tokai Carbon CB Borger Plant**

Dear Sir/Madame:

Per Provision 54 of the Consent Decree, Tokai Carbon CB hereby provides notice that the Borger Plant experienced a malfunction at the Wet Sulfuric Acid (“WSA”) scrubber unit on September 23, 2021. This WSA scrubber unit started operation on September 3, 2021, and it is still in the process of being commissioned. It is expected that the commissioning of this newly installed equipment will last for approximately another two weeks.

At around 2:40 PM on September 23, the WSA scrubber unit suddenly tripped. Plant personnel then had to open the emergency bypass valve to relieve the pressure within the system. The commissioning team tried to restart the WSA scrubber unit. However, the combustion /augmenting air valve malfunctioned, and it did not allow the duct burner to purge or the duct burner pilot to be lit. This valve did not open more than 30-40% of its designed flow. The commissioning team made multiple attempts to free this control valve but their efforts were not successful. Plant personnel then started the shutdown of the production process at about 8:10

PM. This shutdown of the entire production process was completed at about 8:32 PM on September 23. The duration of this event was approximately five and a half hours.

The Borger Plant has remained shut down and not producing product since this event, but we anticipate restarting late on September 29, 2021.

In addition to this notice, Tokai Carbon CB will assert an affirmation defense this malfunction event in the next semi-annual compliance report per Provision 77 of the Consent Decree. Please let me know if you need additional information.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Long B. Nguyen', with a stylized, flowing script.

Long B. Nguyen